

**NAVAJO GENERATING STATION**

P.O. Box 850  
Page, AZ 86040  
{928} 645-6217  
Fax {928} 645-7298

**ROBERT K. TALBOT**  
Manager

June 6, 2013

Mr. Geoffrey Glass  
US EPA Region 9 (AIR-3)  
75 Hawthorne St.  
San Francisco, CA 84105

**Re:    *Acid Rain Permit Renewal***  
          *Navajo Generating Station*



Dear Mr. Glass:

During an internal audit of the Navajo Generation Station, located in Page, Arizona, we discovered that when we submitted our Title V permit renewal application to Navajo EPA in December, 2012, we inadvertently left out the Acid Rain renewal application forms. We have been advised by the Navajo EPA staff to forward this renewal application to you, since the Navajo Nation does not have an Acid Rain permit delegation.

If you have any questions regarding this application submittal, please contact Barbara Cenalmor at (602) 236-2322.

Sincerely,

A handwritten signature in black ink, appearing to be "RT" or "Talbot".

Robert Talbot, Manager  
Navajo Generating Station

cc w/attachment:   Terri Lameman Austin, NNEPA  
                          Paul Ostapuk, NGS  
                          LOC 6-2-8

Federal Operating Permit Program (40 CFR Part 71)

**CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)**

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

**A. Responsible Official**

Name: (Last) Talbot (First) Robert (MI) K

Title Plant Manager

Street or P.O. Box P.O. Box 850

City Page State AZ ZIP 86040 -

Telephone ( 928 ) 645 - 6217 Ext.  Facsimile ( 928 ) 645 - 7298

**B. Certification of Truth, Accuracy and Completeness** (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) 

Name (typed) Robert K. Talbot Date 06/06/13



### Permit Requirements

#### STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
  - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
  - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
  - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
  - (ii) Have an Acid Rain Permit.

### Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

### Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
  - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
  - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
  - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
  - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

### **Sulfur Dioxide Requirements, Cont'd.**

**STEP 3, Cont'd.**

- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

### **Nitrogen Oxides Requirements**

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

### **Excess Emissions Requirements**

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
  - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
  - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

### **Recordkeeping and Reporting Requirements**

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
  - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

### Recordkeeping and Reporting Requirements, Cont'd.

**STEP 3, Cont'd.**

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
  - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
  - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

### Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

### Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

**Effect on Other Authorities, Cont'd.**

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,


(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

**Certification**

STEP 4

Read the  
certification  
statement,  
sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Kara Montalvo	
Signature 	Date 6/6/13



## Phase II NO<sub>x</sub> Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9

This submission is: ☒ New ☐ Revised

Page **1** of **2**

### STEP 1

Indicate plant name, State,  
and ORIS code from NADB,  
if applicable

Plant Name Navajo Generating Station	State AZ	ORIS Code 4941
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### STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable.  
Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for  
tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option  
selected for each unit.

ID# 1	ID# 2	ID# 3	ID#	ID#	ID#
Type T	Type T	Type T	Type	Type	Type

(a) Standard annual average emission  
limitation of 0.50 lb/mmBtu (for Phase I  
dry bottom wall-fired boilers)

☐☐☐☐☐☐

(b) Standard annual average emission  
limitation of 0.45 lb/mmBtu (for Phase I  
tangentially fired boilers)

☐☐☐☐☐☐

(c) EPA-approved early election plan  
under 40 CFR 76.8 through 12/31/07  
(also indicate above emission limit  
specified in plan)

☐☐☐☐☐☐

(d) Standard annual average emission  
limitation of 0.46 lb/mmBtu (for Phase  
II dry bottom wall-fired boilers)

☐☐☐☐☐☐

(e) Standard annual average emission  
limitation of 0.40 lb/mmBtu (for Phase  
II tangentially fired boilers)

☒☒☒☐☐☐

(f) Standard annual average emission  
limitation of 0.68 lb/mmBtu (for cell  
burner boilers)

☐☐☐☐☐☐

(g) Standard annual average emission  
limitation of 0.86 lb/mmBtu (for  
cyclone boilers)

☐☐☐☐☐☐

(h) Standard annual average emission  
limitation of 0.80 lb/mmBtu (for  
vertically fired boilers)

☐☐☐☐☐☐

(i) Standard annual average emission  
limitation of 0.84 lb/mmBtu (for wet  
bottom boilers)

☐☐☐☐☐☐

(j) NO<sub>x</sub> Averaging Plan (include NO<sub>x</sub>  
Averaging form)

☐☐☐☐☐☐

(k) Common stack pursuant to 40 CFR  
75.17(a)(2)(i)(A) (check the standard  
emission limitation box above for most  
stringent limitation applicable to any  
unit utilizing stack)

☐☐☐☐☐☐

(l) Common stack pursuant to 40 CFR  
75.17(a)(2)(i)(B) with NO<sub>x</sub> Averaging  
(check the NO<sub>x</sub> Averaging Plan box  
and include NO<sub>x</sub> Averaging form)

☐☐☐☐☐☐



Plant Name (from Step 1) Navajo Generating Station

## STEP 2, cont'd.

ID#	ID#	ID#	ID#	ID#	ID#
Type	Type	Type	Type	Type	Type
(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)					
(n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)					
(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing					
(p) Repowering extension plan approved or under review					

## STEP 3

Read the standard requirements and certification, enter the name of the designated representative, sign &

## Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

## Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO<sub>x</sub> as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO<sub>x</sub> for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO<sub>x</sub> for Phase II units with Group 1 boilers under 40 CFR 76.7.

## Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Kara Montalvo
Signature	<i>Kara Montalvo</i>
Date	6/6/13